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8 Attorney for Plaintiff
9 SABRINA DOMINGUES

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

13 SABRINA DOMINGUES

14 Plaintiff

15 v.

16 UNITED STATES POSTAL SERVICE
17 OF THE UNITED STATES OF
18 AMERICA

19 Defendant.

CASE NO C06-00911 PVT

STIPULATION AND PROPOSED
ORDER CONTINUING DEADLINE TO
PROFOUND WRITTEN DISCOVERY

Hon. Patricia Trumbull

20 WHEREAS the parties have agreed to extend the time for defendant
21 to provide further responses to plaintiff's written discovery;

22 WHEREAS the depositions of certain defendant employees and
23 person most knowledgeable set for October 19, 2006, were taken off
24 calendar and are to be re-set pending defendant's further discovery
25 responses;

26 WHEREAS it is possible that defendant may disclose in their
27 discovery responses additional persons that plaintiff may wish to
28 depose and/or raise further issues requiring additional written
discovery;

STIPULATION TO EXTEND LAST TO PROFOUND WRITTEN DISCOVERY

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1 IT IS HEREBY AGREED by and between the parties in this matter,
2 through their respective counsel, as follows:

3 1. That the deadline for propounding written discovery is
4 extended from October 27, 2006 to December 1, 2006;

5 2. That the factual discovery cut-off on liability is extended
6 from December 1, 2006 to January 5, 2007; and


7 3. That Mr. Petry, defendant's "person most knowledgeable,"
8 will be produced for deposition on or before November 21, 2006.

9
10 Dated: Oct 27, 2006


JOHN J. GARVEY III
Attorney for Plaintiff

12 KEVIN V. RYAN
13 United States Attorney

14 Dated: Oct 27, 2006


CLAIRE T. CORMIER
Assistant United States Attorney

17 ~~XXXXXX~~ O R D E R


18 PURSUANT TO THE STIPULATION IT IS SO ORDERED:

19 1. That the deadline for propounding written discovery is
20 extended from October 27, 2006 to December 1, 2006;

21 2. That the factual discovery cut-off on liability is extended
22 from December 1, 2006 to January 5, 2007; and

23 3. That Mr. Petry, defendant's "person most knowledgeable,"
24 will be produced for deposition on or before November 21, 2006.

25
26 Dated: November 1, 2006


HONORABLE PATRICIA V. TROMBULL
JUDGE OF THE UNITED STATES DISTRICT
COURT IN AND FOR THE NORTHERN
DISTRICT OF CALIFORNIA

28 STIPULATION TO EXTEND LAST TO PROPOUND WRITTEN DISCOVERY

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